

EXHIBIT A

(Proposed Order)

UNITED STATES BANKRUPTCY COURT FOR THE
DISTRICT OF DELAWARE

In re: :
ZEN JV, LLC, *et al*, : **Chapter 11**
Debtors. : **Case 25-11195 (JKS)**
: **(Jointly Administered)**
:

**ORDER APPROVING MOTION FOR AN ORDER AUTHORIZING AND DIRECTING
THE IMMEDIATE PAYMENT OF THE ADMINISTRATIVE CLAIM OF
SUSAN FALLON PURSUANT 11 U.S.C. §§ 503(b)(1)(A) AND 507(a)(2)**

Susan Fallon (“Ms. Fallon”) having filed a Motion for an Order Authorizing and Directing the Immediate Payment of the Administrative Claim of Susan Fallon Pursuant to 11 U.S.C. §§ 503(b)(1)(A) and 507(a)(2) and for Related Relief (the “Motion”); and parties-in-interest having received adequate notice; and the Court having considered the Motion and any responses thereto; and after due deliberation and sufficient cause appearing therefore;

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

1. The Motion is granted.
2. Ms. Fallon’s Administrative Claim, in the amount of \$305,000.00, is approved and shall be afforded administrative claim status in these chapter 11 cases.
3. Ms. Fallon’s Administrative Claim, in the amount of \$305,000.00, has priority pursuant to 11 U.S.C. § 507(a)(2).
4. The Debtors are authorized and shall pay the Administrative Claim in full immediately from the Debtors’ estate.
5. This Court shall retain jurisdiction over any and all matters arising from or relating to the interpretation or implementation of this order.